

Appl. No: 10/670,645
Amdt. Dated September 7, 2005
Reply to Office action of August 31, 2005

REMARKS/ARGUMENTS

Claims 1-17, 33-36, and 40-41 remain in the application. Claims 18-32 and 37-39 which were previously withdrawn following a restriction requirement are cancelled.

A. Rejections under 35 U.S.C. 103.

Claims 1-17, 33-36 and 40-41 were rejected under 35 U.S.C. 103 based upon Shaffer et al. in view of Mehldahl. This rejection is respectfully traversed.

The Office Action acknowledges that Shaffer does not teach a candidate identification mechanism and relies on Mehldahl to supply this deficiency. However, the Office Action does not point out any specific text or drawing in the Mehldahl reference to support this assertion. Mehldahl does not appear to have a candidate identification mechanism for accessing more than one candidate reference record as called for in claim 1.

Moreover, Mehldahl was filed on October 22, 2004, more than a year after the filing date of the instant application. While Mehldahl is a continuation-in-part of 09/924,704, a quick examination of this parent application reveals that it teaches even less than the Mehldahl reference that was relied upon. Unless the Office can point to specific teaching in the 09/924,704 parent application that shows a candidate identification mechanism, Mehldahl is not available as a reference against the instant claims.

Further still, the Office Action fails to state a prima facie case of obviousness against claim 1. Claim 1 calls for "a matching mechanism for matching a subset of the candidate reference records to the transaction data." The Office Action does not even allege that this element of claim 1 is shown by the combination of Shaffer and Mehldahl. Accordingly, the rejection of claim 1 should be withdrawn.

Claims 2-17 that depend from claim 1 are allowable for at least the same reasons as claim 1 as well as the individual limitations presented in those dependent claims. Paragraphs [0061] and [0116] simply do not show lexical matching as called for in claim 13. This argument has been raised in three responses without any

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response from the Office other than to restate the argument. Please, where is there any lexical matching in the cited paragraphs?

The Office Action once again rejects claims 33-34 for the same grounds as claim 1. Accordingly, the rejection of claims 33-34 is believed to be fundamentally deficient for at least the same reasons as the rejection of claim 1.

Moreover, claims 33-34 include limitations that do not appear in claim 1. The Office Action never states that Shaffer shows "generating a transaction record comprising data that imprecisely identifies at least one channel participant" or "business information having greater precision than the transaction record." It is believed, in fact, that Schaffer's very purpose is to provide precise identification, not to handle varying levels of imprecision as taught by the present invention. For at least these reasons the rejection of claims 33-34 should be withdrawn.

For at least these reason claims 33 and 34-36 that depend from claim 33 are allowable over the relied on reference.

B. Claims 40 and 41.

The rejection of claims 40-41 is deficient for at least the same reasons as the rejection of claim 1. With respect to claims 40 and 41, Mehl Dahl is relied on to show a learning database, but the cited portions of Mehl Dahl do not appear to describe a learning database or a database that is populated based on analysis of transaction records that require manual intervention to be associated with the desired reference record as called for in claim 41. The Office Action does not even allege that the features of claim 41 are shown or suggested by the combination of Shaffer and Mehl Dahl. For at least these reasons claims 40 and 41 are allowable.

C. Conclusion.

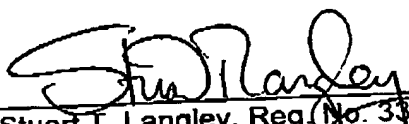
In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicants' attorney at the telephone number listed below.

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Any fee deficiency associated with this submittal may be charged to Deposit
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Respectfully submitted,

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